

NOTICE OF COLLECTIVE ACTION LAWSUIT REGARDING WAGES

If you worked as an armed guard for Cambridge Security Services Corp. ("Cambridge") and were paid on a 1099 basis between March 29, 2010 and the present, please read this notice.

A collective action lawsuit may affect your legal rights.

Important: You are NOT being sued. This Notice is NOT a solicitation from a lawyer. This Notice was authorized by the Court to protect your rights. Please read this Notice carefully.

- Plaintiff Charles Hardy is a current employee of Cambridge in New York and he has brought this lawsuit on behalf of himself and all other armed guards who were paid by Cambridge on a 1099 basis and who worked in excess of forty (40) hours per week. Plaintiff claims that Cambridge required himself and other armed security guards to work more than forty (40) hours per week and failed to pay overtime wages at the required rate of time and one-half their regular rate of pay.
- Cambridge vigorously denies any wrongdoing and/or liability and denies that any security guard was underpaid for his or her work at any time.
- The lawsuit is conditionally proceeding as a collective action on behalf of all armed security guards who were paid on a 1099 basis by Cambridge within the State of New York who worked for Cambridge at any time since March 29, 2010.
- The Court has not decided whether anyone, including you, is owed any overtime wages, and the Court is not endorsing the merits of this lawsuit or advising you to participate in this lawsuit. You are under no obligation to respond to this notice.

• Your legal rights may be affected, and you have a choice to make now:

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT	
ASK TO BE INCLUDED	If you choose to be included in this collective action, you will be bound by any ruling, settlement or judgment, whether favorable or unfavorable. You will also share in any proceeds from a settlement or judgment, but you give up any rights to separately sue Cambridge about the same legal claims in this lawsuit. You may be asked to testify and provide information about the work you performed for Cambridge in order to help the court decide whether you are owed any money. If you wish to be included, you must complete the form at the end of this Notice.

DO NOTHING	By doing nothing, you will not be included in this collective action. This means that you give up the possibility of sharing in any proceeds that may come from a trial or settlement in this lawsuit if those bringing the lawsuit are successful. You keep any rights to sue Cambridge separately about the same legal claims in this lawsuit, but the limitations period on your claims continues to run. Delay in joining this action or proceeding separately may result in some or all of your potential claims expiring as a matter of law.
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- Your options are explained in this **notice**. To ask to be included in the lawsuit, you must act before on JUNE 24, 2013.

This notice contains information that affects your rights. Please read it carefully.

1. Why did I get this notice?

You are getting this notice because the Cambridge records show that you work or worked for Cambridge as an armed guard paid on a 1099 basis within the State of New York who worked more than forty (40) hours in at least one week at any time since March 29, 2010. A lawsuit has been brought against Cambridge alleging that they violated various provisions of federal and New York State wage and hour laws. The Court is trying to determine which workers wish to participate in the case. A trial may be necessary to decide whether the claims being made against Cambridge are correct. The Honorable Edward R. Korman, United States District Court Judge in the Eastern District of New York, and The Honorable Lois Bloom, United States Magistrate Judge in the Eastern District of New York, are overseeing this case. The lawsuit is known as *Hardy v. Cambridge Security Services Corp.*, No. 13 CV 05619(ERK)(LB).

2. What is this lawsuit about?

This lawsuit is about whether Cambridge's compensation practices violate federal and/or New York law. The lawsuit alleges that Cambridge violated federal and New York law by failing to pay New York armed guards overtime rates at one and one-half time their regular rate of pay for hours worked over forty (40) each week. Cambridge vigorously denies these allegations.

3. What is a collective action and who is involved?

In a collective action lawsuit, one or more persons who have similar claims can bring a lawsuit on behalf of others who have similar claims. All armed guards who worked more than forty (40) hours per week for Cambridge in New York, and were paid by 1099, who decide to participate in the case are conditionally part of the "Collective Action" and are "Collective Action Members." The worker who brought this lawsuit — and all of the Collective Action Members — are called the Plaintiffs. The corporate entity that they have sued — Cambridge Security Services Corp. — is called the Defendant. One Court resolves the issues for everyone who decides to join the case.

4. Why is this lawsuit a Collective Action?

The Court has conditionally authorized this case to proceed as a collective action under § 216(b) of the Fair Labor Standards Act ("FLSA"), 29 U.S.C. § 216(b), with respect to

Plaintiffs' federal claims that Cambridge failed to compensate Plaintiffs at their overtime rates for work performed over forty hours each week.

5. What are the Plaintiffs asking for?

With respect to the federal claim to which this notice relates, Plaintiffs are seeking to recover unpaid wages, 100% (double) liquidated damages, attorneys' fees, and costs.

6. Can I join this lawsuit?

To be eligible to join this lawsuit, you must have worked as an armed guard for Cambridge within the State of New York at any time from March 29, 2010 to the present and have been paid through a 1099. Notice is being sent to all such armed guards whose time records demonstrate more than forty (40) hours worked in any one week.

7. What if I still have questions?

If you have any questions, you may contact Plaintiff's attorneys free of charge:

Brent E. Pelton or Taylor B. Graham
Pelton & Associates PC
111 Broadway, Suite 1503
New York, NY 10006 (212) 385-9700
cambridgeWageSuit@peltonlaw.com
www.peltonlaw.com

8. What happens if I do nothing at all?

If you choose not to join this lawsuit, you will not be affected by any ruling, judgment or settlement rendered in this case, whether favorable or unfavorable. You will not be entitled to share any proceeds recovered by Plaintiffs as part of this lawsuit. You also are free to independently retain your own counsel and file your own lawsuit. You should be aware that your federal wage and hour claims are limited by a two or three-year statute of limitations. Delay in joining this action, or proceeding separately, may result in part or all of your claims expiring as a matter of law. If you proceed separately, you may also have to pay your own lawyer.

9. What happens if I join the lawsuit?

If you choose to join this lawsuit, you will be bound by any ruling, settlement or judgment, whether favorable or unfavorable. You will also share in any proceeds from a settlement or judgment. Decisions made and agreements entered into by the named Plaintiffs will be binding on you if you join the lawsuit. While this lawsuit is pending, you may be asked to testify and provide information about the work you performed for Cambridge in order to help the Court decide whether you are owed any money. To join this lawsuit, you must sign and promptly return the enclosed Consent to Join Form by JUNE 24, 2013

10. Can I participate in this lawsuit even though, due to my immigration status, I am or was not working at Cambridge legally?

Your immigration status does not affect your entitlement to participate in this lawsuit. However, you may want to consult with an attorney.

11. Can Cambridge retaliate against me if I join the lawsuit?

It is a violation of federal law for Cambridge to fire, discipline, or in any manner discriminate or retaliate against you for taking part in this lawsuit.

If you believe that you have been penalized, discriminated against, or disciplined in any way as a result of your receiving this notification, considering whether to join this lawsuit, discussing the lawsuit with others, or actually joining this lawsuit, you may contact Plaintiff's lawyers or any other lawyers of your choosing.

12. How do I ask the Court to include me in the case?

Enclosed is a form called "Consent to Join." **If you choose to join this lawsuit, it is extremely important that you read, sign, and promptly return the Consent to Join form.** An addressed and postage-paid envelope is enclosed for your convenience. Should the enclosed envelope be lost or misplaced, the Consent to Join Form must be sent to:

**Clerk of Court
Re: Cambridge Lawsuit
United States District Court, EDNY
225 Cadman Plaza East
Brooklyn, NY 11201**

The signed Consent to Join form must be postmarked by JUNE 24, 2013. If your signed Consent to Join form is not postmarked by that June 24, 2013, you may not be allowed to participate in the federal law portion of this lawsuit.

13. Do I have a lawyer in this case?

If you choose to join this lawsuit, and you do not retain your own attorney, you will be represented by Brent E. Pelton, Taylor B. Graham and other lawyers at Pelton & Associates PC, 111 Broadway, Suite 1503, New York, NY 10006. Their full contact information is listed in section 7 above. You can choose to be represented by Pelton & Associates PC, or if you prefer, you may hire your own lawyer at your own expense.

Cambridge is represented in this action by Jennifer Borek, Esq., of Genova Burns Giantomasi Webster, LLC, located at 494 Broad Street, Newark, New Jersey, 07102. The telephone number for Genova Burns Giantomasi & Webster is (973) 533-0777.

14. How will Plaintiffs' lawyers be paid?

If you choose to be represented by Plaintiff's lawyers, you will not be required to pay any attorneys' fees or costs out of your own pocket. Any attorneys' fees will be paid out of any recovery that is obtained. If there is a recovery, the fees may be part of a settlement obtained or money judgment entered in favor of Plaintiffs, or may be ordered by the Court to be separately paid by Cambridge, or may be a combination of the two. If you are represented by Pelton & Associates PC and Plaintiffs do not recover anything in this lawsuit, you will not have to pay any attorney fees.